

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>JONATHAN ZIEGLER,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No. 4:18-CV-1577</b>
	)	
<b>v.</b>	)	<b>JURY TRIAL DEMANDED</b>
	)	
<b>CITY OF ST. LOUIS, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**DEFENDANTS' NOTICE OF SUPPLEMENTAL AUTHORITY  
REGARDING MOTION TO DISMISS**

In connection with the defendants' pending motion to dismiss the latest amended complaint [ECF 108], defendants respectfully call to the Court's attention the recent opinion of the United States Court of Appeals for the Eighth Circuit, *Quraishi v. St. Charles County*, No. 19-2462, filed January 28, 2021, which appears to have pertinence regarding the issues of qualified immunity raised in the pending motion. A copy of said opinion is attached hereto.

Respectfully submitted,  
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CITY COUNSELOR

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